

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

DECLARATION OF FLORA BIAN

I, FLORA BIAN, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct based on my knowledge, information, and belief.

1. I am the Chief Financial Officer of JND Legal Administration, which is the Court-approved provider of Notice and Administration (“N&A”) services under the BCBS Settlement. I am a Certified Public Accountant, with a Bachelor of Arts in Economics from East China Normal University and a Master of Accountancy from the University of Illinois, Urbana-Champaign. I have been employed by JND for three years and ten months.

2. Through August 31, 2022, the Notice and Administration Fund has been billed fees and expenses totaling \$73,666,447.74. That figure is comprised of fees and expenses JND has billed to the Notice and Administration Fund, \$70,165,249.88, as well as costs the Notice and Administration Fund has been billed and paid in cyber insurance premiums, which totaled \$787,524.10 in 2021 and \$2,713,673.76 in 2022.

3. JND has been asked to calculate the likely N&A expenses if there is a twenty-four-month period in which JND's efforts are placed on "hold" during an appeal. JND projects, based on its experience in this case and in other matters, that additional administration fees and expenses will approximate \$8.4 million over the appeal period, the bulk of which relate to the call center,

email correspondence from class members, electronic storage, and project management. JND also estimates that the Notice and Administration Fund will be billed for an additional \$5.5 million in cyber insurance premiums over that period, assuming that premium rates in that market stay constant for the next two years.

4. JND thus estimates that the costs of the appeal to the Notice and Administration Fund will approximate at least \$13.9 million.

5. JND also expects that its total bill to the Notice and Administration Fund for administering the Settlement will ultimately exceed \$100 million, once all work related to the distribution of the Settlements proceeds to the Class Members is completed.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 6th, 2022

Flora Bian

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